

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

George Gatlin,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 07 C 7212
P.O. A. Criscione, Star #16195,)	
P.O. S. Mulkerrin, Star # 17071,)	
Anthony Caputo, individually, and)	
The City of Chicago, S&H Towing,)	
and Bill Kay Chrysler,)	
Defendants.)	

AFFIDAVIT OF ANTHONY SCHNEIDER

I, Anthony Schneider, being first duly sworn on oath, depose and state as follows:

1. I am the director of Greater Suburban Acceptance Corporation (hereinafter "GSAC"), and have been so employed since June, 2006. GSAC does business at 1645 Ogden Avenue, Downers Grove, Illinois, and its business is the financing of vehicle purchases to customers who are in what is called in the financing business the "secondary finance market".

2. On or about May 2, 2007, GSAC agreed to finance the purchase, by George Gatlin, of a used 2006 Chrysler 200 (the "vehicle"), contingent upon GSAC's ability to verify Mr. Gatlin's residence, employment, and income, as set forth in his credit application. Mr. Gatlin had verified that such information was correct, in a document entitled "Credit Check" (a copy of which is attached as Exhibit D) and he authorized GSAC to verify his employment. (See, Exhibit E)

3. Upon receiving a packet of information concerning Mr. Gatlin from Ogden Chrysler Plymouth, Inc., which does business as Bill Kay Chrysler (hereinafter

“Bill Kay”), it was confirmed (using a service known as “Accurint”) that the phone number for his employer as listed on his credit application was a “cell phone”. In the secondary finance market, when we determine that an employer’s phone number is a cell phone, it is an indication that further investigation is needed.

4. To that end, I contacted Bill Kay and asked Bill Kay to contact Mr. Gatlin to obtain an alternate phone number for his employer. I was subsequently given the number of (773) 856-5318. Using Whitepages.com, I determined that that phone number was registered to a Jose Silva, who lives on Juneway Terrace in Chicago, and not to BBC Construction, Mr. Gatlin’s claimed employer. I called the number and received a recorded message which did not identify a person or a business.

5. I next reviewed Mr. Gatlin’s pay stub, a copy of which is attached as Exhibit F. The pay stub reflects that BBC Construction is located at 1120 North Lawndale, Chicago. I subsequently learned (using a service known as “Accurint”) that 1120 North Lawndale in Chicago is not a business address, but is an apartment complex. I confirmed this utilizing Google Earth. A copy of the screen shot from Google Earth showing that 1120 North Lawndale is an apartment building is attached as Exhibit G.

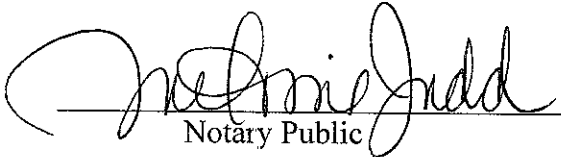
6. I then reviewed additional documents which Mr. Gatlin had supplied to Bill Kay. In so doing, I compared the address which he listed on his credit application as his residence (733 North Lawler, Chicago) with a May 4, 2007 insurance binder showing that Mr. Gatlin’s home address was in Romeoville, Illinois. Copies of the credit application and insurance binder are attached as Exhibits H and I.

7. Having been unable to verify Mr. Gatlin's residence, employer, or income, I decided, on behalf of GSAC, not to fund Mr. Gatlin's purchase of the vehicle or to accept an assignment of the retail installment contract which he had executed, and I then advised Bill Kay of that decision.



Anthony Schneider

SIGNED AND SEALED this 10th day
of February, 2007.



Notary Public

